

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

C.A. NO: 3:16-CV-30142-MGM

JUNIOR WILLIAMS  
Plaintiff,

v.

KAWASAKI MOTORS CORP., U.S.A.,  
KAWASAKI HEAVY INDUSTRIES, LTD,  
and SPRINGFIELD MOTOR SPORTS, LLC  
Defendants.

**DEFENDANTS KAWASAKI MOTORS CORP., U.S.A. AND KAWASAKI HEAVY  
INDUSTRIES, LTD.'S MOTION FOR A PROTECTIVE ORDER REGARDING  
PLAINTIFF'S FAILURE TO SERVE REVISED PROPOSED WRITTEN DISCOVERY,  
AND FOR AN EXTENSION TO CONFER REGARDING PLAINTIFF'S RULE 30(b)(6)  
DEPOSITION NOTICES**

Defendants Kawasaki Motors Corp., U.S.A. ("KMC") and Kawasaki Heavy Industries, Ltd. ("KHI") hereby submit this Motion for a Protective Order Regarding Plaintiff's Failure to Serve Revised Proposed Written Discovery, and for an Extension to Confer Regarding Plaintiff's Rule 30(b)(6) Deposition Notices.

WHEREFORE, for the reasons set forth in the accompanying Memorandum, the Court should issue an Order, (1) confirming that the plaintiff has waived any right to serve proposed interrogatories, or document requests beyond those contained in plaintiff's Rule 30(b)(6) notices, and (2) that the parties shall continue negotiations regarding the scope, timing, and location of the Rule 30(b)(6) deposition of KHI. If agreement cannot be reached, the defendants would have thirty (30) days for the filing of a Motion for a Protective Order.

Defendants,  
Kawasaki Motors Corp., U.S.A.,  
Kawasaki Heavy Industries, LTD.,  
By their attorneys,

/s/ Peter M. Durney  
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**CERTIFICATE OF CONSULTATION**

The parties are in the process of conferring regarding the plaintiff's Rule 30(b)(6) notices. On January 14, 2019, counsel for the defendants Kawasaki Motors Corp., U.S.A. and Kawasaki Heavy Industries, Ltd. informed plaintiff's counsel that if no response to the letter dated January 11, 2019 was received by January 15, 2019, at noon, the defendants would have to make this filing. No response was received.

**CERTIFICATE OF SERVICE**

I, Peter M. Durney, attorney for defendants Kawasaki Motors Corp., U.S.A. and Kawasaki Heavy Industries, Ltd. hereby certify that on the 15th day of January, 2019, a true copy of the foregoing was filed through the ECF System and sent electronically to the registered participants as identified on the Notice of Electronic Filing and that paper copies will be served by first-class mail, postage prepaid, upon anyone indicated as a non-registered participant.

/s/ Peter M. Durney  
Peter M. Durney